



U.S. Department
of Transportation

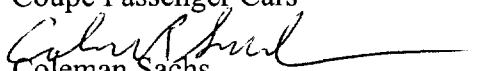
**National Highway
Traffic Safety
Administration**

Memorandum

Subject: Petition for Import Eligibility Decision on
Nonconforming 1999 Chevrolet Corvette
Coupe Passenger Cars

Date: November 5, 2003

From:


Coleman Sachs
Office of Vehicle Safety Compliance

To:

Docket Management

Please place the attached petition for a decision that nonconforming 1999 Chevrolet Corvette Coupe passenger cars are eligible for importation in Docket No. NHTSA-2003-16480-1.

Attachment

#

Sunshine Car Import
Registered Importer # 01-289

4206 Fowler St. Unit A
Ft. Myers, FL, 33901
Tel. 239-278-1020
Fax 239-278-3700

October 1, 2003

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To:
Coleman Sachs
Administrator
National Highway Traffic Safety Administration
Room 6111
400 7th Street SW
Washington, DC, 20590
Attn: NEF-32 Import Eligibility

Dear Sir:

We wish to submit a petition for Import eligibility determination under the provisions set forth in 49 CFR part 593. The following is the basis for this Petition:

Part 593.6(a) (1)

The vehicle for which a determination is sought is a 1999 Chevrolet Corvette Coupe.

We have examined the recall campaigns and we have found no listings for these vehicles. All vehicle reports will have a recall search included with them at the time of submission.

Part 593.6(a) (2)

The vehicle which is substantially similar to the petition vehicle is the US version.

Part 593.6(a) (3)

The vehicle which we believe to be substantially similar is manufactured for sale in the USA and it was certified to meet all applicable FMVSS in effect at the time of manufacture. The non-conforming model was not listed in 55 FR 219, pp219, 47418ff, or the updates that have been published. The differences between the USA model and the non-certified model are very minor, and have been outlined in this petition.

Part 593.6(a) (4)

While our petition vehicle, for which we seek your determination, is substantially similar to the US companion vehicle, it is not labeled as complying by the original manufacturer. We have carefully compared our vehicle to the US certified version thru printed text, and side by side comparison, for all applicable FMVSS, and we find, without reasonable doubt, that our vehicle is substantially similar to the US version, and all minor modifications necessary have been outlined below in the following examination of each applicable FMVSS.

ES02 007201

Part 593.6(a) (5)

The following outline will show that our non-conforming vehicle was originally manufactured to conform to the FMVSS in most areas in the same manner as its US companion model, most of the concerned parts have the same part numbers as the US model. In all the areas that have to be modified, the parts will be supplied by the OE manufacturer. The modifications to the vehicle do not concern the basic structure, only the easily removable and available parts. The parts needed to be replaced by OE manufacturer alone will have the corresponding part numbers listed alongside the applicable FMVSS.

FMVSS 101

All controls and displays meet are identical to those in the US model.

FMVSS 102

The markings, starter interlock, shifting pattern, and brake effect are identical to those in the US model.

FMVSS 103

The windshield defogging and defrosting systems are identical to those in the US model

FMVSS 104

The windshield wiping and washing systems are identical to those in the US model

FMVSS 105

The hydraulic brake system and the parking brake system are identical to those in the US model

FMVSS 106

The brake hoses are identical to those in the US models, and bear the DOT markings.

FMVSS 108

This vehicle came from the Gulf States and the lighting system is identical to US version and are labeled with the DOT symbols, however, European versions may come with non-complying parts and must inspected and replaced with complying parts as necessary.

FMVSS 109

This vehicle came with tires that bear the "DOT" symbol.

FMVSS 110

A tire information placard must be added to fully meet this FMVSS.

FMVSS 111

The drivers inside and outside mirrors meet this FMVSS. However the passengers outside mirror is convex and must either be replaced or engraved with the "Objects may be closer than they appear" inscription.

FMVSS 113

The hood latch system is identical to the US model.

FMVSS 114

This vehicle comes equipped with a key lock system identical to those in the US version.

FMVSS 116

The vehicle comes equipped with "DOT" brake fluid. The DOT brake fluid requirements and information is molded into the cap on the brake fluid reservoir.

FMVSS 118

Our vehicle came from the Gulf States and the power window transport system will not operate without the ignition key in the run position. No modifications are necessary, however, all vehicles will be checked and if necessary, a relay will be wired in to prevent use as per this FMVSS, and a copy of the wiring diagram must be included in the final report.

FMVSS 124

The accelerator control system is identical to the US model

FMVSS 201

The components subject to this FMVSS are identical to the US model.

FMVSS 202

This vehicle came equipped with head restraints that are identical to those on the US model

FMVSS 203

Not applicable when FMVSS 208 is met. Conforms to S5.1 of FMVSS 208, Impact for steering controls system.

FMVSS 204

The steering shaft on this vehicle is energy absorbing and identical to that which is used on the US version

FMVSS 205

The glass and glazing materials used on this vehicle are identical to those used on the US model. They are clearly labeled with the DOT markings. Furthermore, the windshield is labeled AS-1, and all other glass is labeled AS-2.

FMVSS 206

The door locks and retention components are identical to the US model

FMVSS 207

The seating system is identical to the US model

FMVSS 208

Our vehicle complies with the requirements of this FMVSS and is identical to the US version.

It is important to note that our vehicle is identical to the US version in all areas related to the passive restraint system except as specifically noted in this section.

The front outboard designated seating positions are factory equipped with Type II seat belts. The driver's and passenger's seating positions comply as equipped from the factory.

Driver front outboard seating position is equipped with a US version air bag system and knee bolsters. Below please find the OEM part numbers:

Driver's side airbag	10324094
Passenger's side airbag	10415724
Control Unit	12209730

FMVSS 209

The seatbelt labels are identical to those on the US model, and the labels have all the information required by this FMVSS

FMVSS 210

The seatbelt anchorages are identical to those on the US model.

FMVSS 212

The windshield intrusion zone and the parts and engineering thereof are identical to those of the US model

FMVSS 214

Door beams on this vehicle are identical to those in the US version. All vehicles that enter the USA will be inspected for compliance with this FMVSS due to varying regulations thru Europe and the rest of world. Any door beams that must be installed will be identical in materials and craftsmanship to the OE beams.

FMVSS 216

The body of this vehicle is identical to that of the US version

FMVSS 219

The windshield intrusion and related parts and components thereof, are identical to those of the US model

FMVSS 301

Our vehicle comes equipped with a rollover valve in the fuel tank vent line between the fuel tank and the evaporative emissions collector canister.

FMVSS 302

This vehicle is equipped with interior materials that are identical to those used on the US version.

Part 541

This vehicle is listed on 49 CFR 541, appendix A-1" High theft lines with anti-theft devices which are exempted from the parts marking requirements of this standard pursuant to 49 CFR 543." This vehicle has been inspected, and is equipped with a vehicle immobilizer anti-theft system as standard equipment. However, all vehicles entering the US, must be inspected and modified if necessary.

Part 565

A "Vehicle identification Plate" must be added near the left windshield post and a reference and certification label must be added in the left front door post area to meet this FMVSS. Copies of all labels will be included in the final report

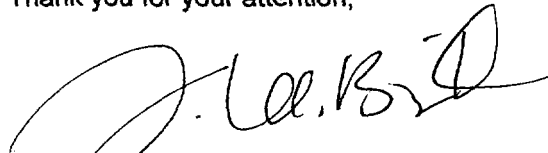
Part 567

Our vehicle will require the addition of a certification label in the driver's side door jamb.

Part 581

The vehicle has been inspected, and comes equipped with bumpers that are identical to the US version. However, all vehicles entering the USA must be inspected and part numbers checked to insure that they are equipped properly to meet this FMVSS

Thank you for your attention,

A handwritten signature in black ink, appearing to read "J. Britt", with a large, sweeping loop at the beginning and end.

Jennifer Britt
Office Manager
Sunshine Car Import